

August 4, 2017

Via E-Mail
r9foia@epa.gov

Regional Freedom of Information Officer
U.S. EPA, Region 9
75 Hawthorne Street (OPA-2)
San Francisco, CA 94105

Re: *Revised FOIA request concerning Exide Technologies*
Location: 2700 South Indiana Street, Vernon, CA 90058 (CAD097854541)

Dear Regional Freedom of Information Coordinator:

Pursuant to the Freedom of Information Act, we request copies of the following records concerning the Exide Technologies facility located at 2700 South Indiana Street, Vernon, CA 90058.

(1) All internal EPA communications concerning the above referenced Exide Technologies facility in Vernon, CA from April 1, 2016 through the present. Internal communications include, but are not limited to, e-mails, letters and memoranda.

(2) All communications between the EPA and other Federal and/or State agencies concerning the above referenced Exide Technologies facility in Vernon, CA from September 1, 2014 through the present. Relevant communications include, but are not limited to, e-mails, letters and memoranda. Relevant Federal and State Agencies include, but are not limited to, the U.S. Department of Justice, the U.S. Department of Transportation, the California Department of Public Health, the California Department of Toxic Substances Control and the South Coast Air Quality Management District.

(3) All documents created by, or provided to, the EPA concerning the Exide Technologies facility in Vernon, CA from April 1, 2016 through the present, including any communications between the EPA and Exide Technologies.

(4) All Hazardous Waste Inspections and/or RCRA Compliance Evaluation Inspections (CEI) of the Exide Technologies facility in Vernon, CA performed by the EPA from January 2000 through the present.

(5) All RCRA Facility Assessments submitted to the EPA concerning the Exide Technologies facility in Vernon, CA from January 2000 through the present.

(6) All RCRA Compliance Evaluation Inspection Reports concerning the Exide Technologies Facility in Vernon, CA from January 2000 through the present.

(7) All Hazardous Waste Permits and Permit Applications for the Exide Technologies facility in Vernon, CA from January 2000 through the present.

(8) All documents, data, correspondence, and reports related to findings of elevated blood lead levels of people living near the Exide Technologies facility from January 2000 through the present.

(9) All documents, data, correspondence, and reports related to findings of no elevation of blood lead levels in people living near the Exide Technologies facility from January 2000 through the present.

(10) All documents, data, communications, and reports related to alternative sources of lead exposure for people living near the Exide Technologies facility.

(11) All documents, data, communications, reports, and test results regarding current or historic point source lead emitters within five (5) miles of the Exide Technologies facility in Vernon, CA.

(12) All transcripts, summaries and notes of any witness and/or employee interviews conducted by the EPA concerning the Exide Technologies Facility in Vernon, CA from 2000 through the present.

Our office represents an interested party in litigation arising from Exide's operation of the battery recycling facility at 2700 South Indiana Street, Vernon, CA 90058.

Please forward the requested materials to my attention and be advised that we are willing to pay reasonable charges and fees incurred in copying these records.

If you have any questions relating to this request or require additional information, please contact me at sjamsa@robinskaplan.com or 612-349-0937.

Thank you in advance for your assistance.

Sincerely,



Siobhan M. Jamsa